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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Valerie McKinney,

Plaintiff,

v.

Experian Information Solutions, Inc.,  
TSC Accounts Receivable Solutions  
and Backgroundchecks.com LLC,

Defendants.

Case No.: 2:22-cv-01354-GMN-VCF

**Stipulated Discovery Plan and  
Scheduling Order Submitted in  
Compliance with LR 26-1(b)**

On October 14, 2022 the first defendant appeared in this case. Accordingly, Valerie McKinney and TSC Accounts Receivable Solutions (jointly as the “parties”), by and through their respective counsel, hereby submit this proposed Joint Discovery Plan and Scheduling Order. The parties will require 180 days of discovery measured from the date the first defendant answered or otherwise appeared.

### **PROPOSED DISCOVERY PLAN**

The parties propose the following discovery plan and scheduling order:

1. Initial disclosures .....December 12, 2022
2. Amend pleadings and add parties ..January 12, 2023
3. Expert disclosures (initial): .....February 13, 2023
4. Expert disclosures (rebuttal): ..... March 13, 2023
5. Discovery cutoff date: .....April 12, 2023
6. Dispositive motions: .....May 12, 2023
7. Pretrial order .....June 12, 2023

In the event that dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after decision on the dispositive motions or until further order of the court.

Pretrial Disclosures: The disclosures required by Rule 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

Extensions or Modifications of the Discovery Plan and Scheduling Order: Applications to extend any date set by the discovery plan, scheduling order, or other order must comply with the Local Rules.

1        Protective Order: The parties may seek to enter a stipulated protective order  
2 pursuant to Rule 26(c) prior to producing any confidential documents.

3        Electronic Service: The parties agree that pursuant to Rules 5(b)(2)(E) and  
4 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be  
5 served by sending such documents by email.

6        Alternative Dispute Resolution Certification: The parties certify that they  
7 met and conferred about the possibility of using alternative dispute-resolution  
8 processes including mediation, arbitration, and early neutral evaluation. The parties  
9 have not reached any stipulations at this stage.

10        Alternative Forms of Case Disposition Certification: The parties certify that  
11 they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and  
12 Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).  
13 The parties have not reached any stipulations at this stage.

14        Electronically Stored Information: The parties have discussed the retention  
15 and production of electronic data. The parties agree that service of discovery by  
16 electronic means, including sending original electronic files by email or on a cd is  
17 sufficient. The parties reserve the right to revisit this issue if a dispute or need  
18 arises.  
19

20        Electronic evidence conference certification: The parties further intend to  
21 present evidence in electronic format to jurors for the purposes of jury  
22 deliberations at trial.

23        ///

24        ///

25        ///

26        ///

1 The parties discussed the presentation of evidence for juror deliberations but  
2 did not reach any stipulations as to the method as this early stage.

3  
4 Dated: November 28, 2022

5 **KIND LAW**

6  
7 /s/ Michael Kind  
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10 **FREEDOM LAW FIRM, LLC**

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12 /s/ Gerardo Avalos —  
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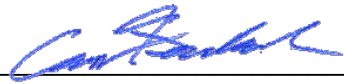
16 **LEWIS BRISBOIS BISGAARD & SMITH LLP**

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21 *Counsel for TSC Accounts Receivable Solutions*  
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**SCHEDULING ORDER**

The above-set stipulated Discovery Plan of the parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

11-29-2022

DATED: \_\_\_\_\_